Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

6/9/2016

Certified Mail

Facility ID: 1677020162
Permit Number: P0120260
County: Summit

Curtis Rinkes
PPG - South Plant
PPG Industries, Inc.
4829 Fairland Road
Barberton, OH 44203-3913

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Minor Permit Modification

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District as indicated on page one of your permit.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Akron Regional Air Quality Management District

FINAL

Division of Air Pollution Control
Title V Permit
for
PPG - South Plant

Facility ID:	1677020162
Permit Number:	P0120260
Permit Type:	Minor Permit Modification
Issued:	6/9/2016
Effective:	6/9/2016
Expiration:	9/7/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
PPG - South Plant

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Authorization

Facility ID:	1677020162
Facility Description:	Chemical and Plastic Sheet Production
Application Number(s):	A0055232
Permit Number:	P0120260
Permit Description:	Title V Minor Permit Modification for Chemical and Plastic Sheet Production which includes the Chloroformate Plant (P098) and the CR-39 Plant (P099) to incorporate the U.S. EPA-approved alternative monitoring for 40 CFR Part 63, Subpart FFFF for the emergency scrubber (E-scrubber) for emissions unit P098.
Permit Type:	Minor Permit Modification
Issue Date:	6/9/2016
Effective Date:	6/9/2016
Expiration Date:	9/7/2017
Superseded Permit Number:	P0106489

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

PPG - South Plant
PPG Industries, Inc.
4829 Fairland Road
Barberton, OH 44203-3913

Ohio Environmental Protection Agency (EPA)District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Akron Regional Air Quality Management District. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Akron Regional Air Quality Management District by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of

federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Akron Regional Air Quality Management District unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Akron Regional Air Quality Management District) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Akron Regional Air Quality Management District with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Akron Regional Air Quality Management District as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theAkron Regional Air Quality Management District.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Akron Regional Air Quality Management District in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Akron Regional Air Quality Management District must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Akron Regional Air Quality Management District, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. The emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

   (Authority for terms: OAC rule 3745-25-04)

3. This facility is subject to the applicable requirements specified in 40 CFR Part 63, Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants for Site Remediation. Site remediation activities are not subject to the requirements of subpart GGGGG (except for certain record keeping requirements) provided the following conditions are met:

   (1) The total quantity of the HAP listed in Table 1 of this subpart that is contained in the remediation material excavated, extracted, pumped, or otherwise removed during all of the site remediation conducted at the facility is less than 1 mega gram (Mg) annually. The 1 Mg limitation applies on a facility-wide basis, annual basis and there is no restriction to the number of site remediation that can be conducted at the facility under the exemption.

   (2) The permittee shall prepare and maintain written documentation to supports the determination that the total HAP quantity in the remediation materials for the year is less than 1 Mg. The documentation shall include a description of the methodology and data used for determining the total HAP content of the remediation material.

   Table 3 to Subpart GGGGG of 40 CFR Part 63 – Applicability of General Provisions to Subpart GGGGG shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

   The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   (Authority for term: 40 CFR 63.7881(c), Subpart GGGGG)

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Internal Combustion Engines: B030, B031 and B032.

   a) Applicable Emissions Limitations and/or Work Practice Standards

	Applicable Rules/Requirements	Applicable Emissions Limitations/Work Practice Standards
a.	40 CFR Part 63, Subpart ZZZZ, Table 2c	Except during periods of startups: a. Change oil and filter every 500 hours of operation or annually, whichever comes first;

	Applicable Rules/Requirements	Applicable Emissions Limitations/Work Practice Standards
		b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
b.	40 CFR 63.1-15	Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the e-CFR website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR 63, Subpart ZZZZ)

5. The following emissions units are subject to 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels and must comply with the record keeping requirements in 40 CFR 60.116b(a) and (b): T057 and T058.

   (Authority for term: 40 CFR 60.116b, Subpart Kb)

6. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Manufacturing: P098 and P099.

   The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the e-CFR website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   (Authority for term: 40 CFR Part 63, Subpart FFFF)

7. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart NNNNN - National Emission Standards for Hazardous Air Pollutants for Hydrochloric Acid Production: P098.

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the e-CFR website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63, Subpart NNNNN)

8. The following insignificant emissions units at this facility must comply with all applicable state and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21 and/or 40 CFR Part 63:

B013 - #1 fine chemical boiler, 6.28 MMBtu/hr (Permit to Install 16-0243);
B014 - #2 fine chemical boiler, 6.28 MMBtu/hr (Permit to Install 16-0244);
B015 - #3 fine chemical boiler, 6.28 MMBtu/hr (Permit to Install 16-0245);
B016 - #4 fine chemical boiler, 6.28 MMBtu/hr (Permit to Install 16-0246);
B017 - #5 fine chemical boiler, 6.28 MMBtu/hr (Permit to Install 16-0247);
B018 - #6 fine chemical boiler, 6.28 MMBtu/hr (Permit to Install 16-0248);
P113 - Wastewater pretreatment system – air stripper (Permit to Install 16-01457);
T012 - T-158, 10,000-gallon diethylene glycol tank, PPG No. 36223;
T013 - T-164, 10,000-gallon alcohol tank, PPG No. 28886;
T014 - T-162, 10,000-gallon MEG tank, PPG No. 28887;
T020 - T-154, 50,000-gallon diethylene glycol tank, PPG No. 28915;
T025 - T-166, 10,000-gallon polycaprolactone diol tank, PPG No. 36091 (Permit to Install P0106015);
T026 - T-145, 5,000-gallon allyl chloroformate tank, PPG No. 25207;
T027 - T-144, 7,600-gallon allyl chloroformate tank, PPG No. 25208;
T028 - T-147, 5,000-gallon isopropyl chloroformate daily storage tank, T04; PPG No. 35672;
T029 - T-149, 7,600-gallon isopropyl chloroformate daily storage tank, T06, PPG No. 25209;
T030 - T-153, 17,000-gallon isopropyl chloroformate daily storage tank, T10, PPG No.19915;
T031 - T-161, 10,000-gallon NPOH tank, PPG No. 21147;
T034 - T-146, 7,500-gallon 2-ethyl hexyl chloroformate daily storage tank, T03, PPG No. 25210 (Permit to Install 16-01330);
T035 - T-152, 24,000 gallon diethylene glycol bis chloroformate tank, T07, PPG No. 34008;
T036 - T-151, 24,000 gallon diethylene glycol bis chloroformate tank, T08, PPG No. 32143;
T037 - T-150, 24,000 gallon diethylene glycol bis chloroformate tank, T09, PPG No. 32142;
T038 - T-155, 10,000 gallon n-propyl chloroformate tank, T11, PPG No. 36213;
T039 - T-156, 10,000 gallon 2-ethyl hexyl chloroformate tank, T12, PPG No. 36214 (Permit to Install 16-01330);
T040 - T-157, 20,000 gallon diethylene glycol tank, T19, PPG No. 25270;
T050 - T-163, 10,000 gallon IPOH tank, PPG No. 21148;
T051 - T-160, 10,000 gallon IPOH tank, PPG No. 19610;
T052 - T-148, 10,000 gallon n-propyl chloroformate, T05, PPG No. 36091;
T053 - T-167, 15,000 gallon east HCl tank, PPG No. 19701;
T054 - T-137, 15,000 gallon west HCl tank, PPG No. 19702;
T055 - T-339, 150,000 gallon northeast wastewater averaging tank, PPG No. 19916;
T056 - T-422, 200,000 gallon southeast wastewater averaging tank;
B030 - Fire pump diesel engine, east, 150 hp;
B031 - Fire pump diesel engine, west, 150 hp;
T057 - T-570, 20,000 gallon monoethylene glycol bis chloroformate (MECF) tank, PPG No. 39010;

T058 - T-571, 20,000 gallon polycaprolactone diol bis chloroformate tank, PPG No. 39011;
T059 - T-573, 10,000 gallon CR-600 product tank #1, PPG No. 39019;
T060 - T-574, 10,000 gallon CR-600 product tank #1, PPG No. 39020; and
B032 - emergency generator, south plant.

(Authority for term: OAC rule 3745-77-07(A)(13))

C. Emissions Unit Terms and Conditions

1. P098, Chloroformate Plant

Operations, Property and/or Equipment Description:

Chloroformate plant

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (P0106015, as effective 04/08/10)	Organic materials emissions shall not exceed 2.0 pounds per hour (limitation established "as carbon"). Hydrogen chloride (HCl) emissions shall not exceed 1.7 pounds per hour. Chlorine (Cl_2) emissions shall not exceed 0.3 pound per hour. Nitrogen oxides (NO_x) emissions shall not exceed 1.6 pounds per hour. See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-21-07(M)(2)	OC shall be reduced by 85% overall control efficiency, by weight. If the reductions are achieved by incineration, 90% destruction efficiency.
c.	OAC rule 3745-21-09(DD)	LDAR program (The LDAR program requirements of 40 CFR 63, Subpart UU (as referenced/required in 40 CFR 63, Subpart FFFF) is considered to be more stringent than the LDAR requirements of OAC rule 3745-21-09(DD)).
d.	40 CFR Part 63, Subpart FFFF	Thermal incinerator and tails scrubber - See b)(2)e. and b)(2)f below. E-scrubber - See b)(2)e. and b)(2)g below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Flare (for non-halogenated process vent streams) - See b)(2)e below. In accordance with 40 CFR 63.2480, the permittee has elected to comply with the requirements of 40 CFR Part 63, Subpart UU to satisfy the LDAR requirements of 40 CFR 63, Subpart FFFF. - See b)(2)h below. (Permittee may comply with alternative LDAR compliance options as provided in 40 CFR 63, Subpart FFFF, Table 6 as referenced by 40 CFR 63.2480.)
e.	40 CFR Part 63, Subpart NNNNN, Table 1	For emission streams from HCl process vents at an existing source: reduce HCl emissions by 99% or greater or achieve an outlet concentration of 20 ppm_v or less; and reduce Cl_2 emissions by 99% or greater or achieve an outlet concentration of 100 ppm_v or less. For emission streams from HCl storage tanks and HCl transfer operations at an existing source: reduce HCl emissions by 99% or greater or achieve an outlet concentration of 120 ppm_v or less. For leaking equipment in HCl service at an existing source: LDAR plan, See b)(2)i. below.
f.	40 CFR 63.1-15	Table 12 to Subpart FFFF of 40 CFR Part 63 – Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply. Table 7 to Subpart NNNNN of 40 CFR Part 63 – Applicability of General

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Provisions to Subpart NNNNN shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The permittee shall employ either an incinerator and tails scrubber to control air contaminant emissions from this emissions unit or an alternative control system consisting of an emergency scrubber (E-scrubber), flare or other control system that can be demonstrated to achieve compliance with the emission limitations and control requirements of this permit.

b. The permittee shall employ a gas chromatograph to continuously monitor the vent stack for phosgene.

c. Pursuant to 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 monitoring and record keeping requirements for the emission point beginning on the date the switch occurs.

d. Pursuant to 40 CFR 63.1019(b), equipment in service less than 300 hours per calendar year is excluded from the requirements of 40 CFR 63.1025 through 40 CFR 63.1036 if it is identified as required in 40 CFR 63.1022(b)(5).

e. In accordance with Table 1 of 40 CFR 63, Subpart FFFF, the permittee shall reduce total organic HAP emissions from Group 1 continuous process vents:

i. by 98% by weight or greater by venting emissions through a closed-vent system to any combination of control devices (except a flare);

ii. or to an outlet process concentration of 20 ppm_v or less as organic HAP or TOC by venting emissions through a closed-vent system to any combination of control devices (except a flare); or

iii. by venting emissions through a closed-vent system to a flare (only for non-halogenated process vent streams).

f. In accordance with Table 1 of 40 CFR 63, Subpart FFFF, the permittee shall control halogenated Group 1 continuous process vent streams when using a combustion control device to control organic HAP emissions using a halogen reduction device located after the combustion device to reduce emissions of hydrogen halide or halogen HAP:

i. by 99% by weight or greater; or

ii. to a mass emission rate of less than or equal to 0.45 kg/hr; or

iii. to a concentration of less than or equal to 20 ppm_v.

g. In accordance with Table 3 of 40 CFR 63, Subpart FFFF, the permittee shall control halogenated Group 1 continuous process vent streams when not using a combustion control device to control organic HAP emissions using a halogen reduction device to reduce emissions of hydrogen halide and halogen HAP:

   i. by 99% by weight or greater; or

   ii. to a mass emission rate of less than or equal to 0.45 kg/hr; or

   iii. to a concentration of less than or equal to 20 ppm_v.

h. Control, detection and timely repair of leaks from equipment subject to 40 CFR 63, Subpart UU (as referenced by 40 CFR 63, Subpart FFFF) will occur in accordance with the following sections:

   i. for valves in gas and vapor service and in light liquid service, 40 CFR 63.1025;

   ii. for pumps in light liquid service, 40 CFR 63.1026;

   iii. for connectors in gas and vapor service and in light liquid service, 40 CFR 63.1027;

   iv. for agitators in gas and vapor service and in light liquid service, 40 CFR 63.1028;

   v. for pumps, valves, connectors, and agitators in heavy liquid service; pressure relief devices in liquid service; and instrumentation systems, 40 CFR 63.1029;

   vi. for pressure relief devices in gas and vapor service, 40 CFR 63.1030;

   vii. for compressors, 40 CFR 63.1031;

   viii. for sampling connection systems, 40 CFR 63.1032;

   ix. for open-ended valves or lines, 40 CFR 63.1033; and

   x. for closed vent systems and control devices, 40 CFR 63.1034.

i. In accordance with Table 1 of 40 CFR 63, Subpart NNNNN, the permittee shall perform the following for leaking equipment in HCl service at an existing facility:

   i. prepare and operate at all times according to an equipment LDAR plan that describes in detail the measures that will be put in place to detect leaks and repair them in a timely fashion; and

   ii. submit the plan to the Administrator for comment only with your Notification of Compliance Status; and

iii. the permittee may incorporate by reference in such plan existing manuals that describe the measures in place to control leaking equipment emissions required as part of other federally enforceable requirements provided that all manuals are incorporated by reference are submitted to the Administrator.

j. The scrubber parametric monitoring and record keeping requirements of 40 CFR 63, Subpart NNNNN are equivalent or less stringent then the requirements of 40 CFR Part 63, Subpart FFFF. As such compliance with the scrubber monitoring and record keeping requirements in Section d) also demonstrates compliance with the similar requirements of 40 CFR 63, Subpart NNNNN.

c) Operational Restrictions

(1) A pilot flame shall be maintained at all times in the flare's pilot light burner when the emissions unit is in operation and employing organic compounds and the flare is being used as a control device.

(Authority for term: OAC rule 3745-77-07(A)(1))

(2) When emissions unit P098 is in operation and the flare is being used as a control device to comply with the organic HAP requirements of 40 CFR 63, Subpart FFFF, the permittee shall comply with the requirements of 40 CFR 61.11(b).

(Authority for term: 40 CFR 63.2450(e)(2), Subpart FFFF)

(3) The daily average fire box temperature within the thermal incinerator, based on an operating day per 40 CFR 63.998(b)(3)(i), shall be maintained at or above the minimum firebox temperature established during the most recent compliance demonstration, whenever P098 is in operation and the thermal incinerator is being used as a control device.

(Authority for term: 40 CFR 63.2450(e), Subpart FFFF)

(4) The daily average pH of the scrubber effluent and liquid gas ratio for the tails scrubber, based on an operating day per 40 CFR 63.998(b)(3)(i), shall be maintained within the pH range and at or above the minimum liquid to gas ratio established during the most recent compliance demonstration, whenever P098 is in operation and the tails scrubber is being used as a control device.

(Authority for term: 40 CFR 63.2450(e), Subpart FFFF)

(5) In accordance with the terms for USEPA approval for alternative monitoring conditions under 40 CFR Part 63 Subpart FFFF established May 18, 2016, compliance while using the emergency scrubber (E-scrubber) to treat process waste gas as a backup to the thermal incinerator shall be demonstrated through compliance with the following requirements:

a. Cease production of chloroformates within 60 minutes of beginning to employ the E-scrubber as an emergency backup to the incinerator; and

b. Perform daily titrations ensuring the caustic strength in the E-scrubber is equal to or above 15 wt% and adding caustic to the solution as needed daily to meet 15 wt%.

(Authority for term 40 CFR 63.8(f), Subpart A)

(6) The daily average liquid gas ratio for the E-scrubber, based on an operating day per 40 CFR 63.998(b)(3)(i), shall be maintained at or above the minimum liquid to gas ratio established during the most recent compliance demonstration, whenever P098 is in operation and the E-scrubber is being used as a control device.

(Authority for term: 40 CFR 63.2450(e), Subpart FFFF)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation and employing organic compounds and the flare is being used as a control device. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, and any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-77-07(C)(1))

(2) The permittee shall monitor the flare to ensure that it is operated and maintained in conformance with its design and the requirements contained in this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

(3) The permittee shall record the following information each day the flare is used as a control device for this emissions unit:

a. all periods during which the emissions unit was in operation and employing organic compounds and the flare is being used as a control device and there was no pilot flame; and

b. the operating times for the flare, monitoring equipment and the associated emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

(4) The permittee shall comply with the applicable monitoring/record keeping requirements of 40 CFR 63, Subparts FFFF, SS, and UU and the USEPA alternative monitoring conditions under 40 CFR 63.8(f) including but not limited to the following:

a. The permittee shall monitor and record the fire box temperature according to the applicable provisions of 40 CFR 63.996 and 63.998 whenever this emissions unit is in operation and the thermal incinerator is being used as a control device.

b. The permittee shall monitor and record the pH of the scrubber effluent and the liquid to gas ratio according to the applicable provisions of 40 CFR 63.996 and

93.998 whenever this emissions unit is in operation and the tails scrubber is being used as a control device.

c. The permittee shall perform a daily titration to determine the caustic strength in the E-scrubber. The permittee shall record the result of the daily titration.

d. If daily titration indicates caustic is required to be added, the permittee shall perform an additional titration after the caustic is added. The permittee shall record the result of this titration.

e. The permittee shall monitor and record the liquid to gas ratio according to the applicable provisions of 40 CFR 63.996 and 93.998 whenever this emissions unit is in operation and the E-scrubber is being used as a control device.

f. When this emissions unit is in operation and the E-scrubber is being used as a control device, the permittee shall record the time when waste gas is diverted to the E-scrubber and, if the duration of E-scrubber use is under 60 minutes, the time when waste gas is no longer diverted to the E-scrubber.

g. If the time that the E-scrubber is being employed exceeds 60 minutes, the permittee shall record the time when production was ceased (i.e., feed rates completely shut off).

h. For MON storage tanks - At time of permit issuance, all MON storage tanks are considered Group 2 and there are no monitoring or record keeping requirements for Group 2 storage tanks.

i. For MON transfer racks - At time of permit issuance, all MON transfer racks are considered Group 2 and there are no monitoring requirements for Group 2 transfer racks. The permittee shall record annually the rack-weighted average partial pressure for all transfer racks that meet the definition as provided in 40 CFR 63.2550.

j. For MON wastewater streams - All MON process wastewater streams are considered Group 2 and there are no monitoring requirements for Group 2 wastewater streams. The permittee shall record annually the Group 2 status of the wastewater streams.

k. For equipment leaks - The permittee shall comply with 40 CFR 63, Subpart UU in order to demonstrate compliance with 40 CFR 63.2480 of 40 CFR, Subpart FFFF as described in the MON LDAR plan.

l. Pursuant to 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 monitoring and record keeping requirements for the emission point beginning on the date the switch occurs.

(Authority for term: 40 CFR 63, Subpart FFFF)

(5) When the flare is being used to control organic HAP emissions to comply with 40 CFR 63, Subpart FFFF, the permittee shall comply with the applicable monitoring and record keeping requirements as specified in 40 CFR 63.983, 63.987, 63.997(a) through (c), 63.998 and 63.999 of Subpart FFFF.

(Authority for term: 40 CFR 63.2450(e)(2), Subpart FFFF, and 40 CFR 63, Subpart SS)

(6) The permittee shall comply with the applicable monitoring/record keeping requirements of 40 CFR 63, Subpart NNNNN, including but not limited to the following:

a. The permittee shall comply with the facility's LDAR plan for equipment in HCl service required per Table 1 of 40 CFR 63, Subpart NNNNN as referenced in 40 CFR 63.9000(a).

b. The permittee shall comply with all applicable record keeping requirements under 40 CFR 63, Subpart NNNNN, as provided in 40 CFR 63.9055.

(Authority for term: 40 CFR 63, Subpart NNNNN)

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(Authority for term: OAC rule 3745-15-03(A))

(2) The permittee shall submit quarterly deviation reports that identify all periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time and duration of each such period.

(Authority for term: OAC rule 3745-77-07(C)(1))

(3) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

(4) The permittee shall comply with the applicable notification and reporting requirements of 40 CFR 63, Subpart FFFF, including but not limited to the following:

a. The pre-compliance, notification of compliance status (NOCS) and semiannual compliance reports specified in Table 11 or 40 CFR 63, Subpart FFFF as referenced by 40 CFR 63.2520.

b. Notification of Process Change - In accordance with 40 CFR 63.2520(e)(10)(ii)(C), the permittee shall submit a notification 60 days before the scheduled implementation date of change from Group 2 to Group 1 for any emission point. The notification shall include the information specified in 40 CFR 63.2520(e)(10)(i).

c. Notification of Compliance Status (NOCS) Report - In accordance with 40 CFR 63.2445(d) and 63.2450(g)(5), if any Group 2 emission point becomes a Group 1 emission point, results of all initial compliance demonstrations must be included in an NOCS. The NOCS must be submitted within 150 days after the switch occurs. The NOCS shall contain the applicable information specified in 40 CFR 63.2520(d).

d. In accordance with 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee shall comply with Group 1 reporting requirements for the emission point beginning on the date the switch occurs.

(Authority for term: 40 CFR 63, Subpart FFFF)

(5) When the flare is being used to control organic HAP emissions in order to comply with 40 CFR 63, Subpart FFFF, the permittee shall comply with the reporting requirements as specified in 40 CFR 63.983, 63.987, 63.997(a) - (c), 63.998 and 63.999.

(Authority for term: 40 CFR 63.2450(e)(2), Subpart FFFF)

(6) The permittee shall comply with the applicable notification and reporting requirements of 40 CFR 63, Subpart NNNNN, including but not limited to the following:

a. The semiannual compliance reports specified in Table 6 of 40 CFR 63, Subpart NNNNN as referenced by 40 CFR 63.9050.

b. The immediate startup, shutdown and malfunction reports per 40 CFR 63.9050(f).

(Authority for term: 40 CFR 63, Subpart NNNNN)

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 2.0 pounds per hour, on an “as carbon” basis.

Applicable Compliance Method:

Compliance shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1 - 4 and 18 or 25, as appropriate, of 40 CFR Part 60, Appendix A and the requirements specified in f)(2) below.

(Authority for term: OAC rule 3745-21-10 and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

HCl emissions shall not exceed 1.7 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 1 - 4 and 26A of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

c. Emission Limitation:

Cl_2 emissions shall not exceed 0.3 pound per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 1 - 4 and 26A of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

d. Emission Limitation:

NO_x emissions shall not exceed 1.6 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 1 - 4 and 7E of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1))

e. Emission Limitation:

85% overall organic compounds emissions control efficiency, by weight.

If the reductions are achieved by incineration, 90% destruction efficiency.

Applicable Compliance Method:

As long as compliance with 40 CFR Part 63, Subpart FFFF, as specified in f)(3) and f)(4) below, is achieved and maintained, compliance with the VOC emission limitations above shall be demonstrated.

(Authority for term: OAC rule 3745-21-10 and OAC rule 3745-15-04 and OAC rule 3745-77-07(C)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit for both the thermal incinerator/tails scrubber and the E-scrubber in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission limitation for OC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable hourly mass emission limitation for OC:

Methods 1 through 4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. During each test run while employing the tails scrubber and thermal incinerator, the permittee shall monitor and record both the scrubber liquid pH and flow rate for the tails scrubber and the combustion temperature for the thermal incinerator every 15 minutes at a minimum and include the results in the test report.

g. During each test run while employing the E-scrubber as control equipment, the permittee shall monitoring and record the scrubber liquid flow rate every 15 minutes at a minimum. Additionally, the caustic strength of the scrubber liquid for the E-scrubber shall be measured prior to each test run. The results shall be included in the test report.

h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-21-10 and OAC rule 3745-15-04 and OAC rule 3745-77-07(C)(1))

(3) The permittee shall comply with the applicable testing requirements of 40 CFR 63, Subpart FFFF, including but not limited to the following requirements associated with changes from Group 2 to Group 1 status:

a. Initial compliance demonstration – In accordance with 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee shall conduct an initial compliance demonstration as specified in 40 CFR 63.2450(g)(5) within 150 days after the switch occurs.

b. In accordance with 40 CFR 63.2445(d), if any Group 2 emission point becomes Group 1, the permittee shall comply with Group 1 testing requirements for the emission point beginning on the date the switch occurs.

(Authority for term: 40 CFR 63.2445(d), Subpart FFFF)

(4) When the flare is being used to control organic HAP in order to comply with 40 CFR 63, Subpart FFFF, the permittee shall comply with the testing requirements as specified in 40 CFR 63.2450(f) and 40 CFR 63.987(b).

(Authority for term: 40 CFR 63.2450(f), Subpart FFFF)

g) Miscellaneous Requirements

(1) None.

2. P099, CR-39 Plant

Operations, Property and/or Equipment Description:

CR-39 Process

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) (P0114761, as effective 9/1/2015)	Volatile organic compound (VOC) emissions from the process vents shall not exceed 5.39 pounds per batch and 14.28 tons per year. Fugitive emissions of VOC shall not exceed 16.0 tons per year.
b.	OAC rule 3745-21-07(M)(2)	Exempt from control requirements per OAC rule 3745-21-07(A)(3) due to applicability of OAC rule 3745-21-14.
c.	OAC rule 3745-21-14(C)(3)(b)	Exempt from control requirements provided aggregate uncontrolled total annual mass emissions less than 30,000 pounds of VOC from the process vents of the batch process train.
d.	40 CFR Part 63, Subpart FFFF (applicable only during production of CR-600)	See sections b)(2)a.-b)(2)c., d)(4), e)(4) and f)(3).
e.	40 CFR 63.1-15 (applicable only during production of CR-600)	Table 12 to Subpart FFFF of 40 CFR Part 63 – Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. Pursuant to 40 CFR 63.2435 the requirements of 40 CFR Part 63, Subpart FFFF do not apply to this emissions unit during the production of CR-39 since CR-39

production does not process, use or generate any of the organic HAP listed in section 112(b) of the Clean Air Act or hydrogen halide or halogen HAP.

b. Pursuant to 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 monitoring and record keeping requirements for the emission point beginning on the date the switch occurs.

c. Pursuant to 40 CFR 63.1019(b), equipment in service less than 300 hours per calendar year is excluded from the requirements of 40 CFR 63.1025 through 40 CFR 63.1036 if it is identified as required in 40 CFR 63.1022(b)(5).

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid flow rate on a once per shift basis, and the daily average values for each of the 3 shift readings (or 1 or 2 shift readings on days when the emissions unit was operated for only 1 or 2 shifts). The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee.

a. The acceptable pressure drop across the scrubber, that shall be less thanor equal to 6 inches of water, based upon an average value of all 3 shift readings for each day.

b. The acceptable scrubber liquid flow rate shall not be less than 3.0 gallons per minute, based upon an average value of all 3 shift readings for each day.

Whenever the monitored value for any parameter deviates from the range(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

c. the date and time the deviation began;

d. the magnitude of the deviation at that time;

e. the date the investigation was conducted;

f. the name(s) of the personnel who conducted the investigation; and

g. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

h. a description of the corrective action;

i. the date the corrective action was completed;

j. the date and time the deviation ended;

k. the total period of time (in minutes) during which there was a deviation;

l. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

m. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These ranges for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable OC emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(2) The permittee shall maintain monthly records that identify the following:

a. The date(s) and time(s) for all periods of CR-39 production.

b. The date(s) and time(s) for all periods of CR 600 production.

(3) The permittee shall comply with the applicable monitoring/record keeping requirements of 40 CFR 63, Subparts FFFF, SS and UU including but not limited to the following during all periods of CR-600 production:

a. The permittee shall monitor and record the pressure drop across the scrubber and the scrubber liquid flow rate according to the applicable provisions of 40 CFR 63.996 and 93.998 whenever this emissions unit is in operation.

b. For MON storage tanks - At time of permit issuance all MON storage tanks are considered Group 2, and there are no monitoring or record keeping requirements for Group 2 storage tanks.

c. For MON transfer racks - At time of permit issuance all MON transfer racks are considered Group 2, and there are no monitoring requirements for Group 2 transfer racks. The permittee shall record annually the rack-weighted average partial pressure for all transfer racks that meet the definition as provided in 40 CFR 63.2550.

d. For MON wastewater streams - All MON process wastewater streams are considered Group 2, and there are no monitoring requirements for Group 2 wastewater streams. The permittee shall record annually the Group 2 status of the wastewater streams.

e. For equipment leaks - The permittee shall comply with 40 CFR 63, Subpart UU in order to demonstrate compliance with 40 CFR 63.2480 of 40 CFR, Subpart FFFF as described in the MON LDAR plan.

f. Pursuant to 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee must comply with the Group 1 monitoring and record keeping requirements for the emission point beginning on the date the switch occurs.

(4) The permittee shall maintain records of the uncontrolled total annual mass emissions for the batch process train and documentation verifying these values or measurements. The documentation shall include the engineering calculations, any measurements made in accordance with OAC rule 3745-21-14(F), and the potential or permitted number of batch cycles per year, or in the alternative, total production of the process train.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber or the liquid flow rate was outside of the appropriate range contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the pressure drop or liquid flow rate into the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

(3) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) The permittee shall comply with the applicable notification and reporting requirements of 40 CFR 63, Subpart FFFF, including but not limited to the following:

a. The pre-compliance, notification of compliance status (NOCS) and semiannual compliance reports specified in Table 11 or 40 CFR 63, Subpart FFFF as referenced by 40 CFR 63.2520.

b. Notification of Process Change - In accordance with 40 CFR 63.2520(e)(10)(ii)(C), the permittee shall submit a notification 60 days before the scheduled implementation date of change from Group 2 to Group 1 for any emission point. The notification shall include the information specified in 40 CFR 63.2520(e)(10)(i).

c. NOCS Report - In accordance with 40 CFR 63.2445(d) and 63.2450(g)(5), if any Group 2 emission point becomes a Group 1 emission point, results of all initial compliance demonstrations must be included in an NOCS. The NOCS must be submitted within 150 days after the switch occurs. The NOCS shall contain the applicable information specified in 40 CFR 63.2520(d).

d. In accordance with 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee shall comply with Group 1 reporting requirements for the emission point beginning on the date the switch occurs.

(5) The permittee shall notify the director in writing if the uncontrolled total annual mass emissions from the batch process train exceed 30,000 pounds of VOC, within sixty days after the event occurs. Such notification shall include a copy of all records of the event.

(6) The permittee shall submit an initial compliance report, within sixty calendar days after the compliance dates specified in OAC rule 3745-21-14(J), containing the information specified in OAC rule 3745-21-14(I)(2).

(7) The permittee shall notify the appropriate Ohio EPA District Office or local air agency in writing that the batch process train is subject to OAC rule 3745-21-14. The notification, which shall be submitted not later than sixty days after the effective date of this rule, shall provide the information specified in OAC rule 3745-21-14(K)(5).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 5.39 pounds per batch and 14.28 tons per year.

Applicable Compliance Method:

Compliance with the VOC emission limitation above shall be demonstrated based on the results of emission testing in accordance with the requirements specified in section f)(2) below.

The annual emission limitation was developed by multiplying the allowable VOC emission limitation, in pounds per batch, by 5298 batches per year, and then dividing by 2000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the maximum number of batches produced per year is maintained.

b. Emission Limitation:

Fugitive emissions of VOC shall not exceed 16.0 tons per year.

Applicable Compliance Method:

The annual fugitive emission limitation above was developed by using the emission factors contained in USEPA's "Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017, November 1995).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the control efficiency:

Methods 1 through 4, and 18 or 25, as appropriate, of 40 CFR Part 60, Appendix A.

Each test run shall last for the entire duration of a batch production cycle.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

f. During each test run, the permittee shall monitor and record both the pressure drop across the scrubber and the scrubber liquid flow rate every 15 minutes and include the results in the test report.

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(3) The permittee shall comply with the applicable testing requirements of 40 CFR 63, Subpart FFFF, including but not limited to the following requirements associated with changes from Group 2 to Group 1 status:

a. Initial compliance demonstration – In accordance with 40 CFR 63.2445(d), if any Group 2 emission point becomes a Group 1 emission point, the permittee shall conduct an initial compliance demonstration as specified in 40 CFR 63.2450(g)(5) within 150 days after the switch occurs.

b. In accordance with 40 CFR 63.2445(d), if any Group 2 emission point becomes Group 1, the permittee shall comply with Group 1 testing requirements for the emission point beginning on the date the switch occurs.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit listed above maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install (PTI) prior to making a “modification”

as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.